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13 *Attorney for Plaintiffs*

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CAROL WINGFIELD, an Individual,  
  
Plaintiff,

vs.

GREEN KEY SOLUTIONS, LLC, a  
Foreign Limited Liability Company;  
HEALTHCARE PARTNERS OF  
NEVADA, LLC, a Domestic Limited  
Liability Company; HEALTHCARE  
PARTNERS MEDICAL GROUP  
(COATS), LTD., a Domestic Professional  
Corporation; DAVITA MEDICAL GROUP;  
DAVITA CLINICAL RESEARCH; DOES I  
-X; and ROE CORPORATIONS I -X,

Defendant.

**CASE NO.: 2:19-cv-00815-JCM-NJK**

**MOTION FOR EXTENSION OF TIME  
WITHIN WHICH  
TO SERVE SUMMONS AND  
COMPLAINT**

**(Second Request)**

COMES NOW, Plaintiff Carol Wingfield (“**Plaintiff**”), by and through her attorneys, Jenny L. Foley, Ph.D., Esq. and Marta D. Kurshumova, Esq. of HKM Employment Attorneys LLP, and hereby submits her Motion for Extension of Time Within Which to Serve Summons and Complaint.

On May 10, 2019, Plaintiff filed a Complaint with the United States District Court for

1 the District of Nevada. Plaintiff did not serve the Summons and Complaint to Defendants due  
2 to on-going negotiations. On August 14, 2019, this Court issued a Notice of Intent to Dismiss  
3 Plaintiff's Complaint pursuant to FRCP 4(m) unless Proof of Service is filed on September 13,  
4 2019. On September 11, 2019, this Court granted Plaintiff's First Motion for Extension of Time  
5 Within Which to Serve Summons and Complaint and extended the deadline for service until  
6 October 14, 2019.

7 This request is sought in good faith and not for the purpose of delay. The Parties are  
8 still currently working on the language of the settlement agreement and wish to avoid the  
9 potentially unnecessary time and expense of service of the Summons and Complaint,  
10 Defendants' responses to the Complaint, the Parties completion of the FRCP 26(f) Conference,  
11 and the Parties exchanging initial disclosures. As such, Plaintiff respectfully requests this  
12 Court's approval of a thirty (30)-day extension for Plaintiff to serve the Complaint and  
13 Summons to Defendants, which would permit the Parties to exhaust early settlement  
14 discussions before incurring further litigation costs.

15 Dated this 15<sup>th</sup> Day of October, 2019.

16 **HKM EMPLOYMENT ATTORNEYS, LLP**

17 /s/ Jenny Foley

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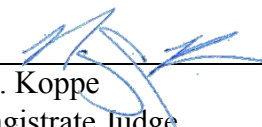
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28 *Attorneys for Plaintiff*

26 IT IS SO ORDERED.

27 DATE: October 16, 2019

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Nancy J. Koppe

U.S. Magistrate Judge